

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DIRECT REPORT CORPORATION d/b/a
SHAREHOLDER.COM,

Plaintiff,

v.

CCBN.COM, INC., THE THOMSON
CORPORATION, JOHN DOES 1
THROUGH 5, AND JANE DOES 1
THROUGH 5,

Defendants.

Civil Action No. 04-10535-PBS

**DEFENDANT ADLER'S MOTION TO IMPOUND HIS OPPOSITION TO PLAINTIFF'S
MOTION FOR LEAVE TO SHARE CONFIDENTIAL INFORMATION WITH THE
ATTORNEY GENERAL'S OFFICE AND SUPPORTING MEMORANDUM**

Defendant Robert Adler ("Adler"), with the assent of counsel for the Defendants, hereby moves to impound his Opposition to Plaintiff's Motion For Leave to Share Confidential Information with the Attorney General's Office, as well as his memorandum supporting that motion, which are being delivered by hand to the Court today. Impoundment is necessary because Adler's motion and memorandum contain references to matters that are covered by the Stipulated Protective Order issued by this Court, which Adler does not want to violate.

ROBERT ADLER,

By his attorneys,

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July 22, 2005

LOCAL RULE 7.1(a)(2) CERTIFICATION

The undersigned hereby certifies, pursuant to Local Rule 7.1(a)(2), that counsel for Adler has attempted to communicate with counsel for the other named parties in good faith to resolve the issues presented in this motion. Counsel for co-defendants agreed to impoundment. Counsel for Plaintiff could not be reached, and a voice mail message was left for Thane Scott.

Mark B. Dubnoff
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